

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL  
CORPORATION,

*Plaintiff,*

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

*Defendant.*

Case No. 17-mc-00151 (LPS)

**DECLARATION OF JUSTIN M. ELLIS IN SUPPORT OF RED TREE'S  
REPLY IN SUPPORT OF ITS OBJECTION  
TO THE SPECIAL MASTER'S FINAL RECOMMENDATION**

Justin M. Ellis declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a member in good standing of the bar of the State of New York. I am a partner at MoloLamken LLP, and I represent Red Tree Investments, LLC ("Red Tree"). I am appearing before this Court *pro hac vice* on behalf of Red Tree.

2. I make this declaration in support of Red Tree's Reply in Support of Its Objection to the Special Master's Final Recommendation based upon personal knowledge.

3. Attached hereto as Exhibit A to this Declaration is a true and correct copy of excerpts from the transcript of the July 29, 2025 deposition of Xiao Song.

I declare under penalty of perjury that the foregoing is true and correct.

August 13, 2025  
New York, New York

/s/Justin M. Ellis  
Justin M. Ellis